

**UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
IN CLERKS OFFICE**

Albert William Bleau Jr.

Plaintiff

2006 MAR 10 A 9:46

U.S. DISTRICT COURT
DISTRICT OF MASS.

vs.

Civil Action
No. 04 – 10469REK

Greater Lynn Mental Health
& Retardation Association, et al,

Defendants

**MOTION TO DELAY TRIAL FOR SIXTY DAYS TO DECEMBER 8,
2006 TO ALLOW TWO ADDITIONAL MONTHS FOR DISCOVERY.**

Plaintiff Albert W. Bleau Jr. respectfully requests that the trial on the Breach of Contract claim and alleged claims for defamation and ADA are delayed for two months allowing the plaintiff two additional months for discovery.

Plaintiff works and commutes to his consultant jobs in Connecticut, Maine and Massachusetts, on average, over sixty hours each week. Plaintiff needs additional time for discovery and trial preparation.

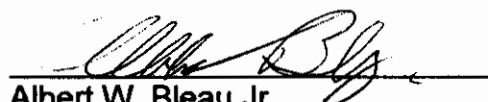
Plaintiff is filing an appeal of the Court's decision and order of February 8, 2006. If a timely decision is not received, the plaintiff will request an additional trial delay pending the Appeal Court's decision. However, while the Appeals Court makes its decision, discovery can still proceed on Defamation, ADA and Breach of Contract as it pertains to defendant's actions after November 8, 2000.

The defendants delayed discovery by one month when they requested that the plaintiff agree to a delay in plaintiff's December Discovery Motion in order to schedule a meeting to reach a joint decision on discovery.

The same issues that were in dispute prior to the meeting remained in dispute after the meeting and no negotiation took place. See plaintiff's recent motion and objection of February 7, 2006. There continues to be disagreement on the number of interrogatories that can be served on the defendant and on the number of written questions and depositions that can be allowed the plaintiff.

In addition, the defendant has filed a motion to deny the plaintiff discovery with current board members of Bridgewell who may have knowledge or were involved in defamation, breach of contract and the plaintiff's ADA complaint. This action has delayed plaintiff's strategy and attempts at discovery.

Respectfully submitted,


Albert W. Bleau Jr.
505 Paradise Rd. #208
Swampscott, MA 01907
(781) 962-2662

Dated: March 10, 2006

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon defendants GLMHRA, et. al by first class mail on March 10, 2006


Albert w. Bleau Jr.